



# Modern Slavery Statement FYE 31.12.23

June 2024

**People. Passion. Pride.** Since 1833.



# Our Statement

## 1. Introduction

This Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the “UK Act”), the Australian Modern Slavery Act (Commonwealth) (the “Australian Act”) and the Norwegian Transparency Act (the “Norwegian Act”) (together the “Acts”) and is published on behalf of John Menzies Ltd (the “Company”) and certain of its wholly owned subsidiaries i.e. Menzies Aviation (UK) Limited, Menzies Aviation (ASIG) Limited, Air Menzies International Limited, Menzies Aviation (Holdings) Australia Pty Limited and Menzies Aviation (Ground Services) Australia Pty Ltd, and Menzies Aviation (Oslo) AS (together the “Subsidiaries”), each being required to report under one or both of the Acts. References in this Statement to “we”, “us” or “our” are to both the Company and its Subsidiaries.

This is our updated Statement for the financial year ending 31 December 2023.

As required under the various Acts, this Statement details our approach and the steps we have taken to identify and address modern slavery and human trafficking risks, our approach to due diligence, and the steps we have taken to ensure that slavery and human trafficking do not occur in our supply chains or any part of our operations.

This Statement is published on our Menzies Aviation website and uploaded to relevant government databases. It provides key stakeholders including the general public access to the key findings from the due diligence, as well as Menzies implemented and ongoing efforts to address and combat any actual or potential risks.

## 2. Consultation

This joint Statement was prepared in consultation with stakeholders from the Company and each of the qualifying Subsidiaries, including our Australian and Norwegian entities. This involved directly liaising with them on specific factors affecting their businesses, supply chains and the geographies they operate in.

In addition to the consultation process to develop this joint Statement, we also work closely with entities and colleagues across the Company, its Subsidiaries (both in scope for this Statement and more widely) and joint ventures on an ongoing basis to implement and monitor our modern slavery risk management approach, including through our supply chain assurance activity. Supply chain assurance is a particular area of focus and change across the organization and will be further discussed later in this Statement.

Our governance and compliance procedures including due diligence, training and policies are set by the Company and cascaded throughout our operations and to all Subsidiaries regardless of whether they are specifically in scope for compliance with the Acts. All policies, standards and controls must always be followed globally.

Ultimate responsibility for all Subsidiaries rests with our Company Board of Directors. The Board of Directors of John Menzies Ltd as well as the Board of Directors of each of the Subsidiaries are aware that this statement is being made on their behalf and have been given the opportunity to participate in the preparation of this statement. Approval and sign off is provided by the relevant Directors of the Company and its qualifying subsidiaries at the end of this Statement.

### 3. An Ethical Approach

Modern slavery can take many forms of human rights abuses and exploitative practices, examples of which include human trafficking, forced or compulsory labour, child labour, slavery and servitude, debt bondage, full or partial restrictions on freedom of movement, withholding and non-payment of wages and induced indebtedness.

We recognise that modern slavery is a crime and a fundamental violation of human rights. We are committed to ensuring there is transparency in our business operations and in our approach to tackling modern slavery throughout our supply chains.

**John Menzies Ltd and its Subsidiaries take a zero-tolerance approach to all forms of modern slavery including child labour and forced labour and are committed to protecting and supporting human rights. We respect the right to freedom of association and fair work and wages for our employees**

As a signatory of the United Nations Global Compact and member of the UK Global Compact Network since April 2021, we fully support the United Nations Guiding Principles on Business and Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We are committed to aligning the global compact principles in the areas of human rights, labour, environment and anti-corruption within our policies, operations and strategies. We will continue to evolve our approach, goals and initiatives for advancing the UN Sustainable Development Goals (SDGs) and provide transparency in our reporting and communications.

We published our first Communication on Progress for UN SDGs and UN Global Compact in September 2022, and our latest update is published in June 2024. In addition to this, our [2023 Annual Review and Sustainability Report](#) provides information our progress against the UN SDG including goals 5 Gender Equality and 8 Decent Work and Economic Growth, which specifically relate to tackling modern slavery and human trafficking.



***SDG Target 8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.***

Our own 'All In' sustainability strategy outlines our priorities, actions and initial targets set for the most material issues across the Environmental, Social and Governance spectrum, and is fully integrated into our approach to strategy, risk, governance and ethical conduct.



Targets and initiatives aimed at supporting human rights are captured in our 'People' and 'Safety' pillars, and more specifically for modern slavery under our 'Legal and Ethical' pillar. Commitments include:

- Zero tolerance to unethical behaviour
- Ensuring sustainable and ethical supply chains and partnerships everywhere we operate
- 1% of our global population recruited from refugees by 2026
- Modern slavery risk assessment undertaken of our suppliers in 2023.



TENT

Menzies Aviation has been a member of the Tent Partnership for Refugees (Tent) since December 2022. Tent connects businesses with government agencies and organisations who work with people that have refugee status. We have a global target of recruiting refugees equivalent to 1% of our global employee population by 2026, with specific targets in Europe for 2026 and the US for 2027. With the support of Tent and Tent country networks, we are focused on local recruitment programmes and partnerships. As part of this, we commit to providing additional training and support (including local language lessons) for all new refugee recruits.


With more and more refugees being forcibly displaced for longer periods of time. We understand some of the barriers people face entering the workforce and believe that as a global employer we have a role to play in helping refugees and displaced people integrate economically in their new host communities.

#### 4. Our Global Business Structure & Operations

Established in 1833 in Scotland, Menzies Aviation is headquartered in London, United Kingdom, and is the largest global aviation services company managing the highest number of aircraft turns annually. We are a partner to the world's airports and airlines, with operations at 297 airports in 65 countries.

We take pride in providing the safest, most secure and consistent aviation services tailored to our customers' needs. This will continue to be our priority as we grow alongside our customers and support their sustainability journeys as the industry transitions to a net-zero future.



 = where we operate



People. Passion. Pride. Since 1833.

## Core Services & Customers

### Ground Services

We provide time-critical airport services, ensuring passengers, crew and aircraft complete journeys efficiently and on schedule. Every passenger journey can have multiple seen and unseen interactions with our teams, and we always do our best to deliver a safe and trusted service alongside a world-class passenger experience.

Our services include:

- Ramp handling and baggage
- De-icing aircraft
- Cabin presentation
- Passenger services from check-in to boarding
- Engineering
- Fixed Base Operations

### Fuel Services

We are the world's largest independent aviation fuel service provider. We deliver fuel farm management and into-plane fuelling services on four continents for the world's largest fuel suppliers, airports and airlines. Managing the refuelling of aircraft and the infrastructure required to support this service is a precision activity which must operate to exacting government and industry standards, including safety and environmental regulations.

We provide:

- Into-plane fuelling.
- Fuel storage and hydrant management.
- Technical services.

### Air Cargo Services

We manage the global transportation of high value and time critical cargo. Decades of experience, supported by cost-effective and innovative logistics solutions, means we are trusted to provide a reliable and secure service.

We provide:

- Warehouse storage facilities.
- Build-up and breakdown.
- Customs clearance requirements.
- Aircraft loading and unloading.
- Freighter aircraft handling.
- Special cargo handling such as live animals and pharma.
- Labour-only services.
- Freight forwarding.

### Executive Services

We welcome guests of the world's leading airlines and membership programme partners through our owned and managed lounge network of almost 60 airport lounges. Our Meet & Assist services are available in more than 180 locations, and we manage 40+ fixed base operator locations, ensuring passengers have a relaxing airport experience and seamless journey on arrival and departure.

Our services include:

- Pearl Lounges
- Meet & Assist
- Fixed Based Operator
- Executive Aviation

## 2023 At a Glance

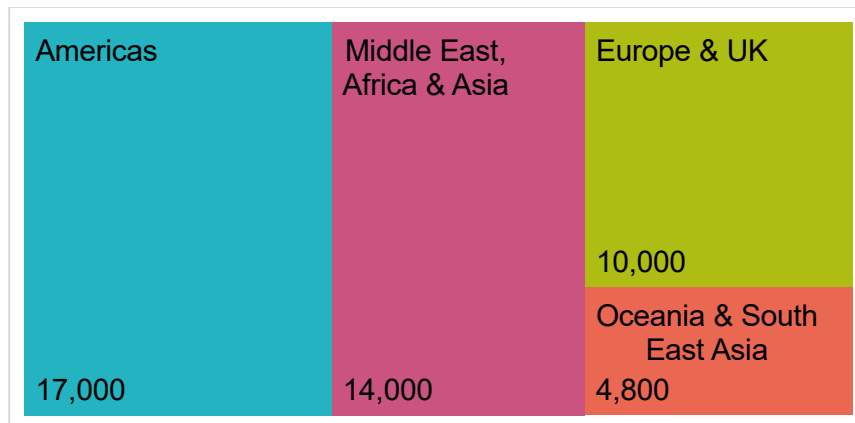
4.5m	>	Flights served
2m	>	Cargo tonnes handled per year
1.3m	>	Aircraft turns per year
3.2m	>	Fuelling turns per year
350k	>	Freight forwarding shipments per year
217m	>	Passengers served
36	>	Lounge locations
1.8m	>	Lounge guests
297	>	Airports
65	>	Countries
45k+	>	Employees globally

## Structure

The Company is managed on a geographical basis primarily in four regional segments: the Americas, Middle East, Africa and Asia, Europe and UK, and Oceania & Southeast Asia.

Our operations are supported by a number of business functions including finance, IT, legal and compliance, HR, commercial, insurance, safety and security, and sustainability. We have office locations around the globe, many in airports, in addition to our UK headquarters and regional offices.

Our employee population has increased significantly over the last few years to well over 45,000 employees today and continues to grow as our business expands. Regionally, employee numbers are split as shown below.



Our employees are further supported by agency workers in many locations, as well as migrant workers in some locations where we operate. With an increasing number of employees to onboard, support and develop, it is vital we maintain excellent recruiting and onboarding practices and training, as well as ensuring our local teams are equipped with the tools, skills and knowledge to nurture and lead.

Further details of our business can be found in our Annual Review and Sustainability Report 2023: <https://menziesaviation.com/annual-review-sustainability-report-2023/>

## Global Supply Chain

Our global supply chains rely on key business partners and suppliers including, but not limited to, sectors including consultancy and professional services, cleaning and security companies, labour and agency providers, equipment providers, IT solutions, infrastructure and hardware, uniform and PPE providers, de-icing suppliers, aircraft fuel companies, catering/food and drink providers, other aviation services providers.

Our local entities in each of the countries we operate engage with many local suppliers as well as global suppliers. In 2023 we had well over 13,000 suppliers globally. We categorise all suppliers based on the type of products or services they supply. We use supplier category, geographical data and financial value/spend to evaluate supplier risk at a high-level. We completed a full-risk assessment of our entire supplier population, identifying those who were high, medium and low risk, and across risk categories such as human rights & fair labour.

Our top suppliers globally are focused on ground service equipment, IT solutions and infrastructure, fuel, labour providers and professional services.

Just over 50% of our supplier population is in the five countries below, the geographical spread is changing across all regions as our business grows.

- United States
- United Kingdom
- Canada
- Australia
- South Africa

## Our Australian Operations

Menzies Aviation Ltd (UK entity)



The chart on the left shows our Australian entities in scope for this report.

Our Australian entities undertake aviation ground handling services, cargo, freight forwarding and engineering services at eleven airport locations across Australia where we are supported by over 2,500 dedicated and highly skilled people.

In Australia, we offer a variety of landside and airside operational

roles and career progression opportunities in areas such as passenger services, ramp services, aircraft turnaround, aircraft cleaning, cargo operations, engineering, safety and security.

Office roles within our business generally include human resources, IT, finance, safety, commercial, office administration, and managerial roles.

We operate in compliance with all applicable labour legislation in all jurisdictions. Menzies Aviation (Australia) Pty Ltd, Menzies Aviation (Ground Services) Pty Ltd and Australian Air Support Pty Ltd are all registered labour hire providers in Victoria, Australia, in accordance with local legislation.

## Our Workforce in Australia

Our workforce in Australia consists of 87% permanent employees, and 13% from agency resource and 'casual' workers.

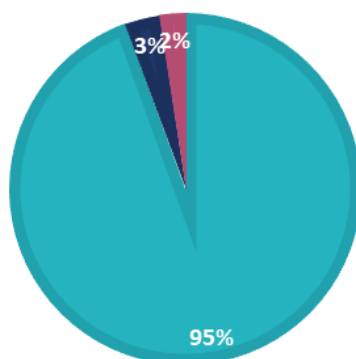
Location (Airport)	Total Employees	Casual/Agency
Adelaide (ADL)	94	35
Brisbane (BNE & WTB)	439	24
Cairns (CNS)	51	1
Darwin (DRW)	100	36
Kalgoorlie (KGI)	16	3
Karratha (KTA)	37	12
Melbourne (MEL)	477	31
Gold Coast (OOL)	25	3
Perth (PER)	293	62
Sydney (SYD)	641	107
Regional Management Teams	56	
<b>Totals</b>	<b>2229</b>	<b>320</b>



The charts below show the split of role types for our Australian workforce.

## WORKFORCE BY ROLE TYPE

■ Operations (ungraded) ■ Support (ungraded) ■ Graded Managers



### Our Australian Supply Chain

Within Australia, our top suppliers include, but are not limited to:

- Cabin Services Australia who provides aircraft cabin cleaning services
- agency labour providers, Blue Collar Recruitment, Wymap People, Momentum Consulting Group, Certis Security
- Wymap Group who provide cargo trucking solutions
- TCR GSE – Australia who provide ground services equipment and maintenance
- Mini-Tankers Australia who provide fuel for equipment and vehicles
- Linde, supporting with forklift trucks
- uniform providers

We also rely on many third parties for IT services, office supplies and office cleaning. Agency labour is necessary to support seasonal work and where we face workforce shortages and challenges recruiting directly in the local labour market. We only use trusted partners for this type of labour support, many of whom will become direct employees.

The risk of human rights breaches is reduced for cabin cleaning service providers and similar, where staff must be security cleared to be able to operate airside. This includes checks by Australian Border Force.

### Our Norwegian Operations

Our operations in Norway consist of two separate entities, both located at Oslo Airport:

- Menzies Aviation (Ground Handling Services)
- Menzies Aviation Washing (Aircraft Washing Services)

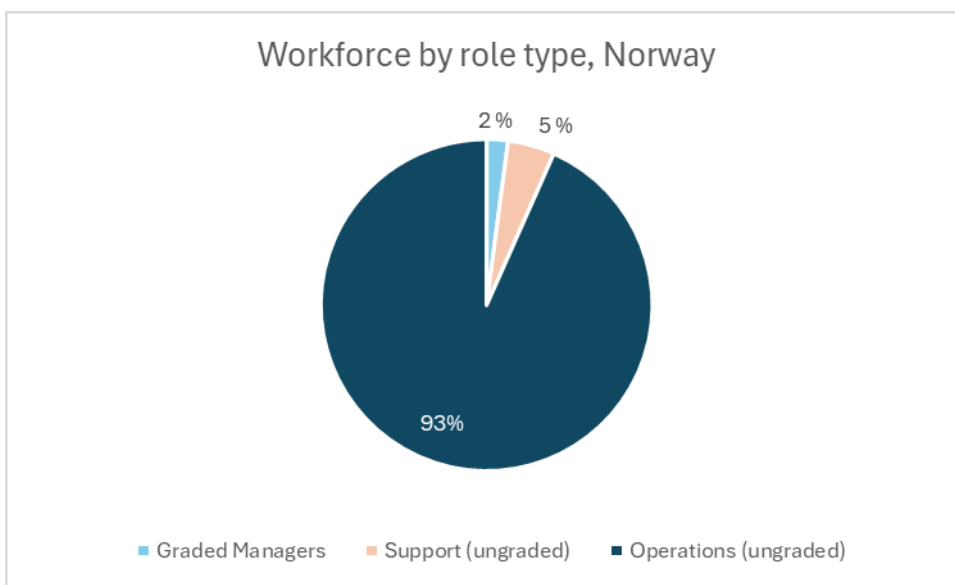
### Our Workforce in Norway

Our workforce in Norway consists of 578 employees. The OSL station has no current workers contracted through agencies, nor any employees on casual worker contracts.

Seasonal contracted workers cover a temporary need during winter or summer operations throughout the year. All employees are in addition of Norwegian Work Environmental Act governed by a CLA, ensuring equal, fair and safe conditions for the workers.

Entity	Total Employees	Seasonal Employees
Menzies Aviation Oslo AS (ghs)	578	2
Menzies Aviation Washing AS	4	0

The roles are split as per the below chart.



Operational roles include Passenger Services, Operational Control Centre and Turnround Coordinators, Baggage Handling, Ramp Handling, De-icing operations.

Support roles consist of administrative support such as payroll, finance, planning and HR, GSE, Safety, GSE and other office positions.

### Our Norwegian Supply Chain

Our top suppliers in Norway include, but are not limited to:

- Sodexo – aircraft cleaning services
- Pecus - recruiting agency for candidate search and initial screening of candidates
- TCR GSE and HiSERV - providers for ground support equipment
- SSP - catering services provider
- Vaske Jentene - cleaning services for company venue
- Uniform providers, office supply providers, and similar.

Known and trusted providers are used for the services provided by external parties. Risk of any breaches of human rights are also reduced for those companies operating on the airside, as the Norwegian CAA conduct background checks for ID-card holders at the airport, security checks are a daily routine, and border control checks are conducted as necessary.

## 5. Modern Slavery Risk Management Framework

It is important to us that we lead by example and demonstrate to our own stakeholders that we set and operate to the highest standards, acting responsibly and ethically at all times. In accordance with this, we expect the same from our own third parties, including suppliers, contractors, consultants (our “Suppliers”) and joint venture partners.

We therefore seek to ensure that we engage only with those Suppliers who uphold the values to which we adhere and require that all our Suppliers, through contractual commitments, act ethically and with integrity at all times, sharing our commitment to humane and safe working practices.

We work with many Suppliers across the globe, many of whom are critical to our success. We acknowledge some of these Suppliers may operate in sensitive industries and countries (as identified in the Global Slavery Index) and the risk of modern slavery may be greater in some areas than in others. This is considered within our overall risk assessment process along with information from other relevant resources including Transparency International, the UN Global Compact and the TRACE matrix, and The Workplace Rights Index.

We monitor the risk of human rights breaches, fair labour and modern slavery within our overall approach to identifying risks across our business and supply chain. As part of this, we identify categories of suppliers who may pose a higher risk from a modern slavery perspective including our uniform and PPE suppliers, suppliers of temporary/short-term labour, service providers such as cleaning contractors, as well as information technology suppliers. These category factors also inform our risk assessment process and help ensure we focus due diligence and assessment efforts in the best way.

All our Suppliers are expected to be able to demonstrate and provide evidence where appropriate, of the standards they adhere to and to complete a level of risk-based due diligence. In some circumstances this may include audits and independent verification of standards.

Risks at each of our operating locations are assessed based on geography, migrant worker and refugee populations, sub-contractors engaged, and where we provide employee accommodation. We also identify risks and undertake audits of our own employee accommodation.

Our business and internal risks relating to modern slavery, fair labour and human rights are captured and monitored as part of our overarching enterprise risk management framework and entered, reported on and tracked in our online risk registers.

Risks identified in our supplier population through risks assessments and/or due diligence are managed directly with each supplier as they arise.

## 6. Risks of Modern Slavery Practices within our Operations and Supply Chains

There will always be a risk of modern slavery practices occurring within our business, supply chains and operations, which may evolve as we enter new countries of operation or as employee practices change, or as we take on new suppliers and partners. There is also an increased risk due to more displaced peoples through conflict. It's important we remain alert

to potential new risks and external social factors and continue to monitor our operations and our supply chain where such risks are most likely to occur.

We regularly review risks as part of our overall enterprise risk framework. Following our latest review of the risks of modern slavery practices that could arise in relation to our operations, we have noted key updates and changes below.

1. We have taken steps to mitigate the risks within our own operations associated with our accommodation facilities that support migrant workers in Kuwait and Mexico.
2. As our population continues to grow and we engage with new labour agencies in new geographies, there remains a heightened risk, particularly where those resources are engaged on a temporary basis as opposed to becoming our own permanent employees.
3. As our business grows, we both inherit and directly seek new suppliers in new geographies. There is a risk we inadvertently work with a new supplier who may not adhere to the same standards we do. Integrating and implementing our supplier procedures including due diligence and contractual controls will help minimize any risks and impacts.

Modern Slavery Risk	Potential Issues	Actions Taken to Assess and Address Risks
<p><b>Directly employed staff</b></p>	<p>Staff employed without following recruitment processes which include appropriate background checks for suitability and ability to work lawfully in the relevant jurisdiction and to ensure appropriate payment.</p> <p>Onboarding new employees from businesses we partner with or acquire.</p> <p>Onboarding migrant and refugee workers poses specific risks where workers may be more vulnerable and less familiar with acceptable recruiting practices.</p>	<p>We have robust recruitment practices, including conducting background and right-to-work checks, in place to ensure employees are engaged appropriately and in compliance with applicable law. Additionally, we comply with the Fair Work Commission modern award for Airline Operations – Ground Staff.</p> <p>Ensure all new employees that join our company are onboarded and inducted properly, including understanding our policies, procedures and Code of Conduct, as well as understanding how they can raise any concerns confidentially and anonymously through our SpeakUp solution.</p> <p>Provide additional support and training for guiding refugees workers through the recruitment and onboarding process, as well as extra support to help them become part of the local community.</p>

		Provide recruiters, managers and co-workers with training and guidance for supporting refugee workers successfully into the workplace.
<b>Employee Accommodation</b>	<p>Sub-standard accommodation, unsafe accommodation or the restrictions placed on employees who live in the accommodation may impact human rights or workers health and wellbeing.</p> <p>Incorrectly managing employment terms and conditions and the provision of accommodation as part of an employee's contract or role could contravene fair labour and employment standards and laws.</p>	Our Employee Accommodation policy and our internal checks and audit processes, as well as regular visits from senior leadership gives us confidence that we are meeting the required standards and protecting our employees' human rights, as well as safety and wellbeing.
<b>Labour providers and service providers</b>	<p>Engaging with labour providers who are themselves engaging in modern slavery, including underpaying staff wages and employee entitlements.</p> <p>Employee misclassification.</p>	<p>Detailed analysis and reporting on our supplier population by category, geography and analysis of risks supported by our new system.</p> <p>Engage more fully with our suppliers through our new onboarding system and processes.</p> <p>Improved supplier due diligence and assessments including assessment of whether provider may themselves have Modern Slavery reporting obligations, which we can review.</p> <p>Ensure awareness of our Third Party Code of Conduct and the obligations of our suppliers.</p> <p>Potential for undertaking our own or requesting independent audits.</p>
<b>Suppliers &amp; Sub-contractors</b>	Engaging with suppliers who are engaging in modern slavery practices including, underpaying staff wages and employee entitlements or engaging in human trafficking.	We set out our actions in relation to suppliers below.
<b>Indirect risks within our supply chain</b>	Engaging with suppliers whose own supply chains may be at increased risk from modern slavery practices, including forced labour, underpaying staff wages or engaging in human trafficking.	We set out our actions in relation to these categories of suppliers in the sections of our report below, including enhanced due diligence and evidence of independent audits. We may also undertake our own audits, where appropriate.

## 7. Governance and Actions for Mitigating Modern Slavery Risks

### Governance

We believe that good governance in today's world is built on strong internal practices that embed social and environmental considerations, as well as ethical conduct, integrity and transparency. Our approach to protecting human rights, fair labour and preventing modern slavery forms a core part of our All In sustainability plan and our company policies and procedures, with the full support of our John Menzies Ltd Board of Directors. Our programme and policies extend company-wide including all our Menzies entities and subsidiaries, as well as sister companies and majority joint ventures. The ultimate responsibility is owned by our John Menzies Ltd Chief Governance & Sustainability Officer.

Our policies and controls are assessed regularly to ensure they remain fit for purpose and evolve and improve in line with changing legislation, business priorities and risk areas, as well as the changing expectations of our stakeholders.

Our All In plan sets goals and commitments across environmental, social and governance topics that are material for our Company. This includes goals that focus on ensuring our supply chain is sustainable, ethical and that we engage and do business with partners that adhere to those same values.

More details on how we govern ourselves can be found on page 42 of our Annual Review and Sustainability Report 2023: <https://menziesaviation.com/annual-review-sustainability-report-2023/>

### Policies and Procedures

Code of Conduct:

Our Code of Conduct (Code) remains at the heart of our suite of ethical and legal policies and is updated regularly to ensure it remains up to date and reflective of the changes that matter for our business, legislatively, socially and culturally. It aims to create and support a culture of ethics, integrity, respect, pride and excellence in our organisation, providing a framework for 'doing the right thing, at the right time'. It is intended to provide our People, at all levels of our organisation, with the awareness and understanding of the values and behaviours expected of them and what they can expect in return as an employee. It acknowledges the rights of our people to engage in collective bargaining as well as other areas relating to protecting their rights. It also covers key areas of ethics, compliance, and sustainability, including modern slavery and human trafficking, human rights, equality, diversity and inclusion, anti-bribery and corruption, environment, the UN SDGs, wellbeing and protecting assets, amongst many other topics.

Human Rights & Fair Labour:

Our Human Rights and Fair Labour Policy sets clear guidance and standards for protecting human rights, fair labour and modern slavery.

Employee Accommodation Policy:

Our Employee Accommodation Policy sets out the minimum standards for living accommodation, health, safety and security and wellbeing, for the development, maintenance and operation/facilitations of any employee accommodation we provide or that is provided on our behalf. New for 2024 will be the establishment of employee forums within each employee

accommodation facility, which will enable better communication between local management teams and employees, specifically on local accommodation topics.

#### Compliance, People and Sustainability Policies

We have many more dedicated people and compliance-related policies and training modules implemented company-wide including: Anti-Bribery and Anti-Corruption; Equality, Diversity and Inclusion; SpeakUp Guidance; to name a small few.

Our ethics, compliance and sustainability-related policies are typically available in 18 languages, reflecting our growing business and increasingly diverse employee population. We want to ensure that policies are readily available, clear and understandable by all employees.

## 8. Contractual Controls and Due Diligence

Our commitment to sustainability, ethical business conduct, and our zero-tolerance position in relation to slavery and human trafficking is evidenced in several ways through our controls and procedures.

1. Through the incorporation of contractual safeguards within our Supplier contracts covering areas such as modern slavery, anti—bribery and anti-corruption, as well as adherence to our Third Party Code of Conduct. We review Supplier contracts and, where possible/if considered appropriate, strengthen their terms to further limit the likelihood of slavery or human trafficking occurring in our supply chains or any part of our business.

Our Third Party Code of Conduct has recently been refreshed. It is available to view at:

<https://menziesaviation.com/third-party-code-of-conduct/>

2. We adopt a risk-based approach to due diligence including for example, human rights and fair labour, ethical conduct, environment, safety, and information security, prior to entering a relationship with any Supplier who may be considered high risk and/or who operates in a higher risk region(s).

Our Third Party Risk Management (TPRM) system has been configured with the support of Deloitte and has links to external databases with the specific aim of enabling supplier risk assessment, due diligence, onboarding and ongoing continued monitoring. Supporting procedures, risk assessments and controls, including a specific focus on human rights, fair labour and modern slavery risks.

We have recently undertaken a human rights and fair labour/modern slavery risk assessment of our global supplier population, providing us with a greater insight to target and work more closely with high-risk suppliers on mitigating human rights, fair labour and modern slavery risks within their operations and supply chains.

Reflecting the number of increasing legislative requirements relating to supply chain risk assessment and due diligence, particularly in Europe, we continue to adapt our processes and systems to ensure compliance and best practice.

Our due diligence of new joint venture partners or companies we acquire is a robust and mature process and includes an assessment of modern slavery risk in addition to all other aspects of due diligence, to ensure we understand business risks and practices. Our integration activities ensure that our policies and training are implemented within any new operations and expectations are clear for all new partners and employees.

## 9. Grievance and Remediation

We offer many channels for seeking guidance, reporting concerns and raising grievances including our independent whistleblowing hotline, which we have had in place across our global network since 2016. Our current whistleblowing hotline service is called 'SpeakUp'.

Our SpeakUp service offers reporters the ability to raise any issues or concerns anonymously and confidentially around unethical conduct, malpractice, illegal acts or failures, including human rights' violations such as slavery or human trafficking. We encourage everyone working with us and on our behalf to use the service in confidence and that their concern will always be taken seriously, treated confidentially and fully investigated. Our service allows us to engage with a reporter via the SpeakUp system without them having to disclose their contact details or identity, enabling us to better investigate any reports made and confirm back to reporters when investigations are concluded.

Our SpeakUp service offers separate contact details for third parties, including suppliers, to report any serious issues or concerns related to our business. Reports can be made anonymously, are always treated confidentially and will be fully investigated and, where required, remedial action will be taken. SpeakUp contact details for third parties are available in our Third Party Code of Conduct.

Our SpeakUp Policy and Guidance is available in a number of languages and the service itself is available in the local language of every location where we operate. Contact details are displayed in operational locations e.g. breakrooms. Our guidance provides information on when and how to make a report, how it will be treated and investigated, and how and when a reporter will be informed of an outcome. We adhere to all applicable legislation in relation to whistleblowing and our own policy standards protect the rights of those making reports in good faith.

As our business has grown over the last few years, we have continued to experience an increase in the volume of reports made via SpeakUp. We ensure employees are made aware of the service with contact details visible in all work locations e.g. breakrooms. The increased awareness and reports give us confidence that our communications are effective, more people feel comfortable making a report and as a result, and we gain greater insight into employee concerns and relations. Most reports continue to focus on concerns or grievances of some form. We have not received any reports in relation to modern slavery or human trafficking.

The safety of our people and our operations is critical and as such, we mandate that all health, safety and security issues, concerns or incidents be reported via our safety management systems to ensure they are communicated, responded to and remediated appropriately. SpeakUp can still be used for anyone who wishes to report a concern or issue in this area anonymously.

We are fully committed to conducting the appropriate investigations and taking the necessary actions should evidence of human rights or fair labour breaches, including modern slavery, ever be identified via SpeakUp or through any other channels. Should any issues be identified or confirmed, we will require that immediate remedial steps are taken to ensure compliance with appropriate standards and legislation. As part of our approach to remediation, we will seek to work together with Suppliers (and other Business Partners), providing guidance and training on protecting human rights, fair labour and modern slavery, as well as other compliance topics, where we believe this may be appropriate and/or beneficial. Where any issues cannot be resolved together with Suppliers or our Business Partners, or in any other part of our supply



chain, steps will be taken to sever the o report this to the relevant authorities, where appropriate,

## 10. Training

We provide continuous learning on ethics, compliance and sustainability topics, and regularly review and improve our policies, practices, and training programmes to address emerging risks and challenges. Training is completed on a cycle of every 1, 2, or 3 years, depending on the topic. To further embed ethical understanding and behaviours, we provide guidance and prompts via other communications on all ethics and compliance topics.

Our Code of Conduct training and many of our other ethical and compliance courses are taken by every employee globally, and other more specific training is role-based.

Our Code of Conduct e-learning module is designed to provide all our employees with a good awareness and understanding of ethical conduct, compliance sustainability topics that apply to our global business, as well as core policies, procedures, legal obligations, and the behaviours we expect. This module includes reinforces our commitment to human rights and our zero-tolerance to all forms of modern slavery and human trafficking.

We have been providing specific Anti-Slavery and Human Trafficking Awareness e-learning to all our employees since 2019, with over 9,000 employees completing this course in 2023. It is designed to increase awareness of modern slavery and human trafficking to ensure our People are better equipped to spot and report any concerns that may arise in the course of their work for us as well as in their personal lives. Within this we incorporated a short video produced by one of our airline industry partners, the International Air Transport Association (IATA), as part of their #eyesopen campaign to fight human trafficking.

We have recently created new guidance for those who onboard workers, including specific new guidance on recruiting and onboarding refugees as employees.

## 11. Measuring Performance & Effectiveness

We recognise that implementing meaningful and robust measures such as KPIs, internal and external audits, and regularly reviewing and making improvements to our processes and controls will provide a level of confidence in how well we are addressing modern slavery risks and how effective our existing processes and controls are at ensuring no modern slavery occurs anywhere in our business or supply chains. This is an area we must continue to improve on, particularly as we adapt our processes and controls and as the risks of modern slavery occurring evolve.

1. We measure and report internally on completion of our training modules including our Modern Slavery Awareness and Code of Conduct e-learning, ensuring all employees complete these as required. This provides a basic level of assurance that we are raising awareness of modern slavery as well as other core compliance topics and our ethical standards, across our business globally. We also request employees to read and sign our core policies and our Code of Conduct.
2. Our 8 Pillar Audit Programme and associated documentation takes into account the provisions for assessing awareness and accessibility of our Code of Conduct, Human

Rights and Fair Labour Policy together with our Third Party Code of Conduct at each location. It also checks local awareness and promotion of our SpeakUp solution. We monitor and review all elements of our Audit Programme regularly and incorporate any improvements or additions as new procedures and controls are embedded. Where issues are identified in the course of our Audit Programme, we require that immediate remedial steps are taken to ensure compliance or, if necessary, relationships with Suppliers will be terminated. We also review our Code of Conduct and other policies and procedures regularly to ensure that they continue to remain appropriate.

3. Our supplier risk assessments help identify those suppliers who need additional focus and due diligence. Our Third Party Risk Management solution gives greater oversight of our supplier population, and will reduce our risk and exposure to wrongdoing within our supply chain, and offer improved auditing and monitoring of suppliers and sub-contractors going forward.
4. Our HR teams recruitment procedures and engagement with labour providers supports our due diligence and controls for onboarding employees and agency resources, particularly in those areas where we may consider there to be a higher risk.
5. We have identified and built in new controls and checks to monitor compliance with employee accommodation standards. This includes physical audits and regular checks of employee accommodation annually and on an ad-hoc basis. This will include some unannounced checks.
6. Our SpeakUp solution offers another way for us to monitor for any reports of wrongdoing raised by employees, agency workers and contractors or other third parties.

We did not identify any International Labour Organization (ILO) indicators of modern slavery anywhere in our own operations or supply chain during 2023.

## 12. Key Areas of Action 2024-2025

Our aim is to ensure that our ethical and legal obligations and responsibilities in relation to human rights, fair labour, modern slavery and human trafficking, together with other key compliance and sustainability topics, remain at the forefront of our employees' and Suppliers' minds through the various means referred to above.

We commit to continuing to keep the Company's supply chains under review to identify and monitor ongoing and future risks.

The actions below reflect continued and new key areas of action to be delivered over the next two years that will help us strengthen our measures to detect and prevent breaches of human rights, fair labour, slavery and human trafficking taking place in our supply chains or any part of our business:

Action	2024 Steps	2025 Steps
<p><b>Continue to improve our Supplier due diligence and Third Party Risk Management procedures.</b></p>	<p>Communication with all suppliers.</p> <p>Review our audit process for high-risk suppliers.</p> <p>Ensure all suppliers are made aware and receive our updated Third Party Code of Conduct.</p>	<p>Ensure all required suppliers successfully complete required levels of due diligence.</p> <p>Review effectiveness of our risk-criteria and engagement levels with suppliers.</p> <p>Identify and implement pro-active remediation guidance for third parties.</p>
<p><b>Continue to develop our refugee onboarding programme and improved processes and monitoring for the recruitment of migrant workers.</b></p>	<p>Continue our work with Tent and partner organisations to share experiences and build on best practice procedures and guidance for the safe recruitment and onboarding of refugees.</p> <p>Review feedback and experiences of refugees onboarded to identify improvements that can be made.</p>	
<p><b>Seek new opportunities and ways to better collaborate with our business and industry partners that help us build on best practice and incorporate learnings.</b></p>	<p>Continue to understand new ways we can improve our support of human rights more fully within the Company and our supply chains, through our commitments and learnings as a signatory of the UN Global Compact.</p>	
<p><b>Continue to develop and create awareness of modern slavery and other human rights risks across our Company.</b></p>	<p>Identify new, practical guidance to engage and refresh awareness and learning for employees.</p> <p>Further upskilling for employees engaged with labour agencies and direct recruitment.</p> <p>Establish employee accommodation forums.</p>	<p>Review learning and policies and refresh, if required.</p> <p>Identify and implement improvements to our internal audit procedures for employee accommodation.</p>
<p><b>Monitor for new human rights and fair labour regulation, legislation and reporting requirements across different geographies and incorporate this into our processes, policies and reporting.</b></p>	<p>Adapt our procedures, policies and controls, particularly for human rights and fair labour due diligence, aligned with new legislation in geographies where we operate, particularly in relation to the European Union.</p>	<p>Continue to adapt and ensure compliance with all new human rights and fair labour regulation and legislation and reporting and disclosure requirements.</p>

### 13. Further Information

Our customers and key stakeholders can request further information in relation to this Statement via: [Menzies.Sustainability@menziesaviation.com](mailto:Menzies.Sustainability@menziesaviation.com)

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This Statement has been approved by the Board of Directors of John Menzies Ltd and signed on behalf of the Company and all Subsidiaries by John Geddes, Chief Governance & Sustainability Officer and Group Company Secretary. It has also been approved by the Board of each of the Subsidiaries required to report under the Australian Act and signed by a director of each of those Subsidiaries.



30<sup>th</sup> June 2024  
**John Geddes**  
Chief Governance & Sustainability Officer



30<sup>th</sup> June 2024  
**Darren Masters**  
EVP Oceania & Southeast Asia  
MA (Holdings) Australia Pty Ltd  
Menzies Aviation (Ground Services)  
Australia Pty Ltd



30<sup>th</sup> June 2024  
**Mike Roberts**  
SVP Finance  
MA (Holdings) Australia Pty Ltd  
Menzies Aviation (Ground Services) Australia  
Pty Ltd